

REMARKS

Claim 20 was rejected under §112, second paragraph, and has been amended as to form. Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 20 and 23-29 were rejected as unpatentable over Adobe Photoshop 7.0 in view of FREITAG 2006/0265496. Claim 20 has been amended and reconsideration and withdrawal of the rejection are respectfully requested. Support for the amendment is found at page 10, lines 3-22. Claims 22-23 have been canceled.

Amended claim 20 includes a double control, namely a first control among the database and displays so that modification at one of the database and displays affects the others, and a second control among the visual elements on the sheets so that modification of one visual element affects the other visual elements.

In Photoshop, each image to be displayed is formed by superposing several layers, each comprising partial information of the visual element. Modifications of the image affect only the particular image and are made by rearranging the stacking order of the layers (page 131 of Photoshop). Further, in Photoshop, the modifications affect only the display where the modifications are made and do not affect the database until the image is saved, and do not automatically affect the other visual elements based on the predefined rules and graphic criteria in

amended claim 20. The linking of layers described on page 138 of Photoshop does not affect the spatial relationships between the visual elements on the sheets based on the predefined rules and graphic criteria in amended claim 20.

The Official Action indicates (at the end of page 3) that Photoshop has a layered structure that is equivalent to placing different portions of a drawing on sheets of acetate, where individual sheets may be edited, repositioned, and deleted without affecting the other sheets (page 131 of Photoshop). However, the second control in amended claim 20 is the opposite; namely, the modification of one visual element does affect the others. Thus, Photoshop discloses the absence of the second control as claimed.

Further, each of the visual elements in claim 20 is defined by information stored in the database in first fields that store a description of a content of the visual elements and second fields that store a description of an arrangement and presentation of the visual elements and a structure of the layout. By contrast, in Photoshop, each visual element is uniquely defined as an object in a page, where the page consists of the superposition of different layers, each carrying a portion of the visual element, thereby creating a risk of loss of part of a visual element due to overlap.

FREITAG does not make up for these shortcomings and thus the proposed combination does not make the claims obvious to one of skill in the art.

According, claims 20 and 25-29 avoid the rejection under §103.

New claims 30-32 have been added and their consideration and allowance are respectfully requested. Support is found in the original specification at page 10, lines 10-12 and 23-26 and page 12, lines 9-29.

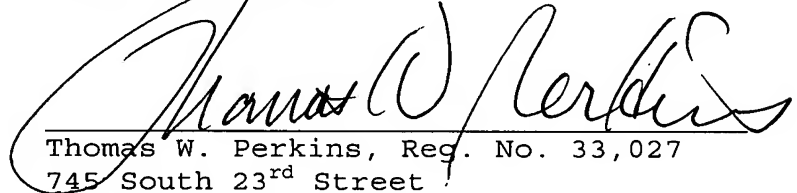
The proposed combination does not disclose or suggest automatically and simultaneously controlling the dimensions and positions of all the visual elements on all the sheets as in claim 30, or the use of an interface to modify the program for the information to simultaneously affect all the visual elements on all the sheets as in claim 31, or that the step of modifying the visual representation of the layout includes modifying all of the same visual element on the different sheets by modifying only one of these same visual elements on one of the sheets as in claim 32.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

YOUNG & THOMPSON

A large, stylized handwritten signature in black ink, which appears to read "Thomas W. Perkins". The signature is written over a horizontal line that separates it from the printed contact information below.

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